

EXHIBIT 3

Matrix of Duplicate Requests
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Every Removed Request	Remaining Duplicate Request
<p>Request 1(h): “Monetary components of the transaction beyond unit price (e.g., <i>sales tax, shipping or delivery fees</i>) or non-monetary components of, or <i>Incentives</i> for, the purchase of the Component or Assembly, including but not limited to, (1) <i>any service, benefit, and/or product that You provided, or received, in connection with the purchase of the Component or Assembly</i>, including service agreements, warranties, or installation, and (2) the value of each such service, benefit, or product”</p>	<p>Request 1(d): “Terms and conditions on which the Component or Assembly was purchased, including but not limited to . . . any <i>adjustments to purchase price</i> and <i>Incentives</i> or allowances issued or applied at any time, including but not limited to, <i>taxes</i>, amortization and amortization schedule, installment payments, financing, rebates, lump sum or other discounts, refunds, credit for returns, and currency or input cost adjustments . . . and . . . <i>Shipping and freight costs</i>”</p> <p>Request 23(2): “<i>APRs, credits, money, or other consideration received</i> from suppliers of Components or Assemblies in connection with any negotiated price reductions and the dates of receipt”</p>
<p>Request 1(i): “For each Component or Assembly purchased by one of Your suppliers pursuant to <i>Directed Buying or Directed Sourcing</i>, the price and terms of any such arrangement, including the entity from which the supplier was directed to purchase the Component or Assembly and at what price and terms”</p>	<p>Request 1(g)(7): “Terms of the RFQ, including supply period covered, design or specifications of the Component or Assembly, <i>Directed Buying or Directed Sourcing</i> (if any) of Components or Assemblies, approved supplier(s) of Component(s) or Assemblies or subcomponents thereof, and any changes in such terms, design or specifications, including post-RFQ changes in terms, design, or specifications (e.g., resulting from manufacturing improvements and APRs)”</p>
<p>Request 1(j): “<i>For each Component or Assembly that You purchased without soliciting proposals, bids, or responses to an RFQ</i> from more than one potential supplier, the manufacturer and supplier of such Component or Assembly, its name or description, part number, and other identifiers, and the reasons why each such Component or Assembly was purchased without soliciting proposals, bids, or responses to an RFQ”</p>	<p>Request 1(l): “<i>All Documents relating to non-RFQ methods of procurement</i>”</p>

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<p>Request 1(k): “All information sought or obtained by You or on Your behalf concerning a <i>market or competitive price</i> for the Component or Assembly, including but not limited to, any market test conducted with respect to the Component or Assembly”</p>	<p>Request 1(g)(17): “Any summary or recap of the RFQ and responses thereto, including but not limited to, <i>each factor considered</i> in deciding from which supplier(s) to purchase the Component or Assembly”</p> <p>Request 13(a): “Your <i>studies, analyses, research, or evaluations concerning the market(s) and competitive conditions for the manufacture</i> and sale of Vehicles”</p> <p>Request 14: “Documents sufficient to disclose, identify, describe, and explain the policies, procedures, methods, standards, decision-making, guidelines, factors, and <i>reasons for (i) Your purchases</i> of Components and Assemblies”</p>
<p>Request 2: “Documents sufficient to show any <i>target prices, bids, award prices, and subsequent price adjustments</i> with respect to any RFQ for any Component or Assembly intended to be purchased by You or on Your behalf for installation in a new Vehicle sold or leased in the U.S.”</p>	<p>Request 1(g): “RFQ(s), if any, pursuant to which the Component or Assembly was procured, and the following information for each RFQ: . . . <i>bids . . . Target Price</i>, Limit Price, or <i>anticipated or expected purchase price</i> for the Component or Assembly before and after the supplier was selected . . . <i>Any adjustments made after awards</i>”</p>
<p>Request 4(a)(3)(f): “<i>Shipping or freight costs</i>, and by whom such costs were paid”</p>	<p>Request (4)(e): “Monetary components of the transaction beyond unit price (e.g., financing, sales tax, and <i>fees</i>)”</p> <p>Request 4(a)(3)(k): “<i>Any other terms and conditions of the sale</i>”</p>
<p>Request 4(a)(3)(g): “Any <i>credit</i> associated with return or repair”</p>	<p>Request 4(a)(3)(c): “Adjustments to invoice price and Incentives or allowances issued or <i>applied at any time</i>, including but not limited to . . . <i>other credits or debits</i>”</p> <p>Request 4(a)(3)(k): “<i>Any other terms and conditions of the sale</i>”</p>

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Request 4(a)(3)(i): “Any offered and accepted <i>price that is different from list</i> ”	Request 4(b)(2)(c): “ <i>Adjustments to list price</i> and Incentives or allowances issued or applied at any time”
Request 4(a)(3)(j): “ <i>Total sales price</i> for the transaction”	Request 4(b)(2)(d): “ <i>Amount paid at time of sale</i>” Request 34: “ . . . Your disaggregated transactional data, including but not limited to . . . the <i>final sales price</i>”
Request 4(a)(5): “Ship-from” and vendor “pay-to” address(es) from which the Vehicle and invoice for it were shipped or sent to purchaser, date(s) the Vehicle and invoice were shipped or sent, “ship-to/delivery” and customer “bill/invoice-to” address(es) where the Vehicle and invoice were shipped or received, and date(s) the Vehicle and invoice were received, and location of sale”	<u>No duplicate</u>
Request 4(a)(6): “ <i>Monetary components of the transaction beyond unit price</i> (e.g., financing, sales tax, and fees) or <i>non-monetary components</i> of, or <i>Incentives</i> for, the sale distinct from net sale price, including but not limited to, (a) <i>any service, benefit, and/or product</i> You received, or provided, in connection with the sale of the Vehicle, including service agreements, warranties, installation, Vehicle options, and (b) <i>the value of each such service, benefit, or product</i> ”	Request 4(e): “ <i>Monetary components of the transaction beyond unit price</i> (e.g., financing, sales tax, and fees) or <i>non-monetary components</i> of, or <i>Incentives</i> , distributor subsidies, rebates, bonuses, or allowances for, the sale of the Vehicle to the retail purchaser (e.g., consumer, leasing company, or other lessor) or lease of the Vehicle distinct from net sale price, including but not limited to (1) commissions, and <i>any service, benefit, and/or product</i> the purchaser (e.g., Vehicle distributor or dealer), retail purchaser or lessee received, or provided, in connection with the sale or lease, including service agreements, or warranties, and (2) <i>the value of each such service, benefit, or product</i> ”
Request 4(a)(9): “Receipts, invoices, bills of sale, purchase contracts, as well as any product-specification requirements and purchase orders You have for these transactions”	Partial overlap; see Request 4(a)(3) “Data or documents (in the absence of data) sufficient to show . . . Terms and conditions of sale”

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Request 4(a)(10): “All other information included on invoices sent to any Customer during the relevant period”	<u>No duplicate</u>
Request 4(a)(11): “A description <i>identifier for each Vehicle</i> ”	Request 4(a)(2): “Model, model year, make, and other <i>identifiers of the Vehicle</i> , including VIN, and product identifier for each Vehicle sold”
Request 4(a)(12): “Manufacturer(s) and seller(s) of each Vehicle sold”	<u>No duplicate</u>
Request 4(c): “ <i>For leases, name, address, and other identifiers</i> of person or entity to whom the Vehicle was leased (e.g., lessee)”	Request 4(b): “Retail purchaser (e.g., consumer, fleet purchaser, leasing company, or other lessor), to whom the Vehicle was eventually sold or <i>leased</i> , including <i>name, address, and other identifiers</i> ”
Request 4(c)(1): “ <i>Date and place</i> (including address) of <i>lease</i> ”	Request 4(b)(1): “ <i>Date and place</i> (including address) of sale or <i>lease</i> ”
Request 4(c)(2)(a)-(o): “Terms and conditions of lease, including but not limited to . . . mileage of Vehicle for which a trade-in allowance was provided.”	<u>No duplicate</u>
Request 4(d): “Any payments, credits, <i>distributor subsidies, rebates, bonuses, Incentives, allowances</i> or consideration received by purchaser (e.g., Vehicle distributor, Vehicle dealer or fleet purchaser) in connection with financing, <i>warranties, insurance, service agreements</i> , or other services or products provided to or purchased by retail purchaser (e.g., consumer, leasing company, or other lessor) or lessee of the Vehicle”	<p>Request 4(e): “Monetary components of the transaction beyond unit price (e.g., financing, sales tax, and fees) or non-monetary components of, or <i>Incentives, distributor subsidies, rebates, bonuses, or allowances</i> in connection with the sale or lease, including <i>service agreements</i>, or <i>warranties</i>”</p> <p>Request 4(b)(2)(e): “Terms of any <i>insurance or warranties</i> provided or sold to the retail purchaser”</p>
Request 4(f): “Repairs or recalls with respect to the Vehicle, nature of repair or recall, whether the Vehicle was returned, and amount of any associated payment, refund or credit”	<u>No duplicate</u>

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Request 4(g): “Address and other identifiers of the facility where the Vehicle was manufactured or assembled”	<u>No duplicate</u>
Request 4(i): “ <i>Purchaser’s</i> (e.g., Vehicle distributor’s or Vehicle dealer’s) actual, or if actual is not available, estimated, <i>direct and indirect purchase, marketing, distribution, selling, leasing and other costs</i> in connection with the purchase and sale or lease of the Vehicle, both fixed and variable, including but not limited to, direct and indirect costs of management, labor, commissions, real estate, financing, overhead, energy, and freight”	Partial overlap; see Request 13(a): “Your studies, analyses, research, or evaluations concerning the <i>market(s) and competitive conditions for the manufacture and sale of Vehicles</i> , including but not limited to, competitors, market shares, market definition(s), profitability, availability of supply, demand conditions, pricing trends, <i>cost conditions</i> , or sales trends, and surveys and/or research concerning the Vehicles, models, brands, and classes of Vehicles that You compete with, including price levels and price comparisons”
Request 4(k): “Your <i>income</i> for each Vehicle for <i>products or services sold by Your finance and insurance department</i> or affiliate, including without limitation finance, insurance, service contracts, extended warranties, and GAP insurance (broken out by units, total dollars, finance income, insurance income, service-contract, extended warranty, and GAP insurance income)”	Partial overlap; see Request 4(b)(2)(d): “Amount paid at time of sale, and any remaining balance due, <i>terms of financing</i> , and duration of monthly or installment payments”; Request 4(b)(2)(e): “ <i>Terms of any insurance</i> or warranties provided or sold to the retail purchaser.”
Request 4(l): “ <i>Purchaser’s</i> (e.g., Vehicle distributor’s or dealer’s) gross <i>profit</i> , profit margin or level, operating profit, projected profit, net profit, and/or profit-and-loss statements for the purchase, sale to a retail purchaser (e.g., consumer, leasing company, or other lessor) and any lease of the Vehicle”	Partial overlap; see Request 13(a): “Your studies, analyses, research, or evaluations concerning the <i>market(s) and competitive conditions for the manufacture and sale of Vehicles</i> , including but not limited to, competitors, market shares, market definition(s), <i>profitability</i> , availability of supply, demand conditions, pricing trends, cost conditions, or sales trends, and surveys and/or research concerning the Vehicles, models, brands, and classes of Vehicles that You compete with, including price levels and price comparisons”

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Request 6: “ <i>VIN databases</i> that include complete specifications for every new Vehicle sold by You or on Your behalf for sale or lease in the U.S.”	Request 4(a)(2): “Model, model year, make, and other identifiers of the Vehicle, including <i>VIN</i> , and product identifier for each Vehicle sold”
Request 7: “Documents identifying, for each year, the total number of <i>new Vehicles sold in the U.S. that were financed</i> , the total dollar amount of <i>finance income earned</i> , the total amount of <i>finance reserve not yet earned</i> , and the total amount of finance <i>commission</i> paid to Vehicle dealers.”	<p>Request 4(b)(2)(d): “Amount paid at time of sale, and any <i>remaining balance due, terms of financing</i>, and duration of monthly or installment payments”</p> <p>Request 4(e): “Monetary components of the transaction beyond unit price . . . including but not limited to (1) <i>commissions</i>, and any service, benefit, and/or product the purchaser (e.g., Vehicle distributor or <i>dealer</i>), retail purchaser or lessee <i>received</i>”</p>
Request 8: “Documents sufficient to show the <i>chronological progress of the prices</i> You charged to each Vehicle dealership for each Vehicle You sold to a Vehicle dealership in the U.S.”	<p>Request 4(a)(3)(a): “Your <i>list or invoice price</i> for the Vehicle (including currency and exchange rate, if applicable) to the purchaser”</p> <p>Request 34: “Your disaggregated transactional data, including but not limited to the <i>cost of each Vehicle</i>, the <i>dealer invoice price</i> for each Vehicle (i.e., the invoice price to Your franchise-dealer Customer), and the <i>final sales price</i> for the Vehicle to the end-payor (i.e., the ultimate consumer of the Vehicle)”</p>
Request 9: “For all new Vehicles sold or leased by Your Customers in the U.S. containing a Component or Assembly installed by You, <i>all Documents relating to finance, insurance, and service contract income</i> (broken out by units, by total dollars, by finance income, by insurance income, and by service contract income) by month.”	Partial overlap; see Request 4(b)(2)(d): “Amount paid at time of sale, and any remaining balance due, <i>terms of financing</i> , and duration of monthly or installment payments”; Request 4(b)(2)(e): “ <i>Terms of any insurance</i> or warranties provided or sold to the retail purchaser.”

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<p>Request 10: “Monthly or periodic reports on Your inventory levels with respect to new Vehicles intended for sale or lease in the U.S.”</p>	<p>Partial overlap; see Request 13(a): “<i>Your studies, analyses, research, or evaluations concerning</i> the market(s) and competitive conditions for the manufacture and sale of Vehicles, including but not limited to, competitors, market shares, market definition(s), profitability, <i>availability of supply</i>, demand conditions, pricing trends, cost conditions, or sales trends, and surveys and/or research concerning the Vehicles, models, brands, and classes of Vehicles that You compete with, including price levels and price comparisons”</p>
<p>Request 11: “Monthly or periodic composite trend reports and expense composite reports for specific expected Vehicle sales by You or on Your behalf for sale or lease in the U.S.”</p>	<p>Partial overlap; see Request 13(a): “<i>Your studies, analyses, research, or evaluations concerning</i> the market(s) and competitive conditions for the manufacture and sale of Vehicles, including but not limited to, competitors, market shares, market definition(s), profitability, availability of supply, <i>demand conditions</i>, pricing trends, cost conditions, or sales trends, and surveys and/or research concerning the Vehicles, models, brands, and classes of Vehicles that You compete with, including price levels and price comparisons”</p>

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<p>Request 12: “Documents, including number, code, or data dictionaries or similar documents, <i>sufficient to disclose, identify, describe, and explain</i> the (a) manufacturer, supplier, vendor, and customer numbers or codes; (b) <i>product, component, and part numbers or codes</i>; (c) <i>model, model platform, VIN, model project or development, and model year numbers or codes</i>; (d) RFQ and RFQ response numbers or codes; (e) plant or facility numbers or codes; (f) <i>Target Price, Limit Price, VE Price or VA Price</i>, or other price numbers or codes; (g) transaction types, including standard sales, credits, debits, returns, and other adjustments related to purchases, sales and any leases of Vehicles, Components, and Assemblies; (h) contract or agreement and invoice numbers or codes; and (i) data fields, that are reflected in data or documents produced in response to these Requests.”</p>	<p>Request 1(f): “<i>Information sufficient to track each Component or Assembly after it was installed</i> in a Vehicle, including <i>model, model platform, model year, model project or development code, vehicle identification number (“VIN”)</i>, and/or part number, and other identifiers of the specific Vehicle(s) in which the Component or Assembly was installed, and quantity or number of each Component and Assembly installed (including measurement unit for quantity or number)”</p> <p>Request 1(g): “<i>Target Price, Limit Price . . . VE Price or VA Price . . .</i>”</p> <p>Request 1(m): “For each Component or Assembly purchased by You, <i>Documents sufficient to describe, identify, and interpret all part numbers assigned</i>, including the manufacturer’s model number, any internal codes, product identifiers, or part numbers used by You”</p>
<p>Request 14(a): “<i>Your review and evaluation of potential manufacturers and suppliers</i> and the Components and Assemblies they offer, including but not limited to, documents sufficient to show comparisons of the quality and/or technological capabilities of the potential suppliers and manufacturers”</p>	<p>Request 1(g)(17): “Any summary or recap of the RFQ and responses thereto, including but not limited to, <i>each factor considered in deciding from which supplier(s) to purchase</i> the Component or Assembly, and the reasons each potential supplier was selected or not selected to supply the Component or Assembly”</p>
<p>Request 14(b): “Your (1) issuance of <i>RFQs</i>, and (2) solicitation of proposals, bids, and responses to RFQs from potential manufacturers and suppliers of Components and Assemblies, including Your consideration, solicitation or use of <i>Target Prices, Limit Prices, cost tables or schedules</i> (e.g., standards or directives regarding the amount a supplier may charge for subcomponents of Components or Assemblies or labor used in the assembly of Components or Assemblies), or the supplier’s <i>VE Prices or VA Prices</i>”</p>	<p>Request 1(g): “<i>RFQ(s)</i>, if any, pursuant to which the Component or Assembly was procured, and the following information for each RFQ . . . <i>cost schedules . . . Target Price, Limit Price . . . VE Price or VA Price . . .</i>”</p> <p>Request 14(c): “. . . Your consideration of (a) estimates of input and other costs and profit margins of manufacturers or suppliers, and (b) manufacturers’ or suppliers’ ability to meet <i>Target Prices, Limit Prices</i>, anticipated or expected prices, <i>Your cost tables or schedules</i>, or <i>VE Prices or VA Prices</i> for Components and Assemblies;</p>

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Request 14(d): “Variations in Vehicle price or Incentives over time or with respect to different geographic areas”	Request 4(a)(3): “(a) Your list or invoice price for the Vehicle . . . and (k) Any other terms and conditions of the sale.”
Request 14(e): “Variations in Vehicle price or Incentives as affected by prices of particular competitive models or trims”	Request 4(a)(3): “(a) Your list or invoice price for the Vehicle . . . and (k) Any other terms and conditions of the sale.”
Request 14(f): “Variations in Vehicle price or Incentives as affected by levels of sales or inventory”	<u>No duplicate</u>
Request 14(g): “Any <i>actual or proposed program or requirement</i> (1) that potential manufacturers and suppliers of Components and Assemblies (a) <i>provide engineers or other personnel or services on-site</i> , or (b) provide or estimate their <i>input and other costs</i> related to the manufacture and sale of Components and Assemblies that You are considering purchasing or acquiring; or (2) that such input and other costs be negotiated with, dictated by, and/or approved by You or on Your behalf”	Partial overlap; see Request 1(g)(6): <i>Guidelines or instructions for responding to the RFQ</i> , as set by You and communicated to any potential supplier”; Request 1(g)(10): “Potential suppliers, if any, that <i>provided on-site engineers or other personnel or services</i> in connection with the Component or Assembly”; Request 14(c): “Your consideration of (a) estimates of <i>input and other costs</i> and profit margins of manufacturers or suppliers”
Request 14(h): “Your negotiation of (1) prices, terms, and conditions of sale, including <i>any rebates, discounts, off-invoice discounts, or other price concessions or Incentives</i> required from, or offered by, potential manufacturers or suppliers of Components and Assemblies, or (2) <i>changes in prices, terms, and conditions of sale</i> , including <i>post- RFQ</i> pricing (e.g., cost-down pricing and <i>Annual Price Reductions</i>)”	<p>Request 1(g)(7): “Terms of the RFQ . . . and any <i>changes in such terms, design or specifications</i>, including <i>post-RFQ</i> changes in terms, design, or specifications (e.g., resulting from manufacturing improvements and <i>APRs</i>)”</p> <p>Request 1(g)(8): “Responses to the RFQ from potential suppliers, including but not limited to . . . and resulting price changes, and <i>any lump sum or other discounts, rebates, allowances, Incentives, or other terms offered</i>”</p> <p>Request 1(g)(18): “Any adjustments made after awards, including <i>changes to price</i> or the quantity allocated to each supplier”</p>
Request 14(i): “ <i>Audits or reports of Your purchases</i> of Components and Assemblies pursuant to International Organization for Standardization (“ISO”) rules or regulations”	Request 1(g)(19): “ <i>Documents, data, or Studies related to historical</i> Component or Assembly bid solicitations, offered bids or <i>winning bids</i> .”

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<p>Request 14(j): “Your provision or disclosure to actual or potential manufacturers or suppliers of Components and Assemblies of information about prices or other terms and conditions offered or charged by other actual or potential manufacturers or suppliers”</p>	<p><u>No duplicate</u></p>
<p>Request 17: “<i>All studies, analyses, research, evaluations</i>, or trade association materials <i>concerning the market(s)</i> in which You or other purchasers of Components and Assemblies have acquired or potentially could have acquired any such Components or Assemblies from any suppliers of such Components or Assemblies for installation in new Vehicles sold or leased in the U.S., including but not limited to studies, analyses, research, evaluations, and trade association materials concerning (a) the nature, scope, competitive conditions, degree of concentration, structure, or other significant aspects of any such market(s); or (b) the identity, size, relative market share, quality, reputation or other significant attributes of any of the participants (including both buyers and sellers) in any such market(s).”</p>	<p>Partial overlap; see Request 1(k): “All information sought or obtained by You or on Your behalf concerning a market or competitive price for the Component or Assembly, including but not limited to, any market test conducted with respect to the Component or Assembly”</p>
<p>Request 18: “All documents relating to any comments, observations, suspicions, or suggestions that the market(s), market or competitive conditions, and market structure(s) for the manufacture, sale, or purchase of Components and Assemblies for installation in new Vehicles sold or leased in the U.S., or for the manufacture, sale, purchase or lease of new Vehicles containing any such Components and/or Assemblies in the U.S. (a) may not be competitive, (b) may involve collusion between or among manufacturers and suppliers of Components and Assemblies, or (c) may involve collusion between or among any OEMs, distributors, or dealerships.”</p>	<p><u>No duplicate</u></p>

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<p>Request 19: “Documents sufficient to show Your internal transfer costs, pricing, or sales of Components and Assemblies for installation in new Vehicles sold or leased in the U.S. between or among divisions or entities within Your corporate family.”</p>	<p>Request?</p>
<p>Request 20: “Documents sufficient to show and describe: (a) what systems are in place for Vehicle dealers and Vehicle distributors to report new Vehicle purchases, sales, and leases in the U.S.; (b) what other information these systems track; and (c) whether each such system includes information on OEM-to-Vehicle dealer, OEM-to-Vehicle distributor, and/or OEM-to-consumer Incentives (e.g., dealer cash, customer cash, holdback, rebates, etc.).”</p>	<p><u>No duplicate</u></p>
<p>Request 21(a): “All monthly, annual, and other periodic reports concerning or reflecting purchases, leases, and/or sales of new Vehicles in the U.S. by each of Your Vehicle dealerships or Vehicle distributors (e.g., financial statements or dealer operating reports)</p>	<p>Partial overlap; see Request 13(a): “<i>Your studies, analyses, research, or evaluations concerning</i> the market(s) and competitive conditions for the manufacture and sale of Vehicles, including but not limited to, competitors, market shares, market definition(s), profitability, <i>availability of supply</i>, demand conditions, pricing trends, cost conditions, or <i>sales trends</i>, and surveys and/or research concerning the Vehicles, models, brands, and classes of Vehicles that You compete with, including price levels and price comparisons”</p>

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<p>Request 21(b): “all studies, analyses, or reports concerning the business performance of Your Vehicle dealerships or Vehicle distributors with respect to purchases, leases and/or sales of new Vehicles in the U.S. Both (a) and (b) should include, but not be limited to, such reports, studies and analyses concerning sales volume by make and model, prices at which dealers or distributors sold the Vehicles by make and model, and any other characteristics of those sales, as well as such dealerships’ and distributors’ financial results, throughput volumes, salesperson activity, marketshare performance, and expected-opportunity performance.”</p>	<p><u>No duplicate</u></p>
<p>Request 23(1), (3)-(5): “Documents sufficient to show: (1) Annual Price Reductions or “APRs” issued to each supplier or manufacturer of Components or Assemblies for installation in new Vehicles sold or leased in the U.S. for each APR negotiation period for each such Component or Assembly and the dates of such APR requests . . . (3) the impact and traceability of APRs and APR requests to particular Components or Assemblies, including but not limited to, the methods, policies, procedures, factors, and standards for (a) how You calculate and issue APR requests issued to suppliers and manufacturers of Components or Assemblies, (b) how and when You account for or credit APRs received from suppliers, and (c) how and when any audit of suppliers’ costs impact Your APR requests; (4) any variation, and the reason for the variation, between Your APR requests issued to each of the suppliers and manufacturers of a particular Component or Assembly; and (5) Your long-term cost reduction initiatives, including but not limited to, announcements, PowerPoint presentations, and supplier meetings containing information about these initiatives.”</p>	<p><u>No duplicate</u></p>

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<p>Request 24: “Documents sufficient to show, for each model of new Vehicle manufactured by You that is sold or leased in the United States, <i>the models of Vehicles manufactured by other OEMs that You consider to be competitors and how (if at all) You considered the pricing by such other OEMs</i> of such models in setting the price of the model manufactured by You.”</p>	<p>Request 13(a): “Your studies, analyses, research, or evaluations concerning the market(s) and competitive conditions for the manufacture and sale of Vehicles, including but not limited to, competitors, market shares, market definition(s), profitability, availability of supply, demand conditions, pricing trends, cost conditions, or sales trends, and surveys and/or <i>research concerning the Vehicles, models, brands, and classes of Vehicles that You compete with, including price levels and price comparisons</i>”</p>
<p>Request 25: “Organizational charts or other documents sufficient to identify Your divisions, departments and managerial employees that have responsibility for: (a) purchasing Components or Assemblies for installation in new Vehicles sold or leased in the U.S., (b) manufacturing new Vehicles sold or leased in the U.S., (c) pricing of new Vehicles sold or leased in the U.S., and (d) sales and marketing of new Vehicles containing such Components and/or Assemblies to Your Customers for sale or lease in the U.S.”</p>	<p><u>No duplicate</u></p>
<p>Request 26: “For all produced data extracted from a larger data system, identify (a) the software hosting the original data (including version number); (b) the process used to extract the data; and (c) the specific queries used to extract the data. For any data that has been altered from the original form in which it was stored, produce the descriptions of any manipulations to the data fields or values, any removed data, any data summarization performed prior to production, and any other alternations that would be required to reproduce the data as originally stored.”</p>	<p><u>No duplicate</u></p>

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<p>Request 28 (first sentence): “All Documents, including but not limited to, any <i>Studies and/or Analyses relating to Your suppliers’ (including Defendants’) pricing</i> of Components or Assemblies sold to You for installation in new Vehicles sold or leased in the U.S., including Documents relating to <i>prices and proposals submitted in response to RFQs</i> and other requests for procurement or price changes.”</p>	<p>Request 1(g)(8): “<i>Responses to the RFQ</i> from potential suppliers, including but not limited to . . . <i>proposed changes</i> in the design, manufacturing, materials, or specifications of the Component or Assembly and <i>resulting price changes</i>, and any lump sum or other discounts, rebates, allowances, Incentives, or other terms offered</p> <p>Request 1(g)(17): “Any summary or recap of the RFQ and responses thereto, including but not limited to, <i>each factor considered in deciding from which supplier(s) to purchase</i> the Component or Assembly, and the reasons each potential supplier was selected or not selected to supply the Component or Assembly”</p> <p>Request 1(k): “<i>All information sought or obtained by You or on Your behalf concerning a market or competitive price</i> for the Component or Assembly, including but not limited to, any market test conducted with respect to the Component or Assembly”</p> <p>Request 14(c): “Your review and evaluation of (1) proposals, bids, and responses to RFQs, and (2) manufacturers and suppliers of Components and Assemblies, including <i>Your consideration of (a) estimates of input and other costs and profit margins of manufacturers or suppliers</i>, and (b) manufacturers’ or suppliers’ ability to meet Target Prices, Limit Prices, anticipated or expected prices, Your cost tables or schedules, or VE Prices or VA Prices for Components and Assemblies”</p>
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<p>Request 29: “Any Documents or data You have provided to the J.D. Powers’ Power Information Network (PIN) concerning new Vehicles sold or leased in the U.S., including but not limited to data that contains the Vehicle make, model and trim, transaction prices, costs, and transaction dates, financing details and trade-in information.”</p>	<p><u>No duplicate</u></p>
<p>Request 32: “All Documents related to <i>requests by You</i> that Defendants or Your other suppliers <i>decrease prices charged</i>, submitted or provided for any Component or Assembly for installation in new Vehicles sold or leased in the U.S., and techniques used to accomplish these reductions.”</p>	<p>Request 1(g)(18): “<i>Any adjustments made after awards</i>, including changes to price or the quantity allocated to each supplier”</p> <p>Request 2: “Documents sufficient to show . . . <i>subsequent price adjustments</i> with respect to any RFQ”</p>
<p>Request 35: “Documents sufficient to show the extent to which <i>suppliers participated in the design and engineering</i> of Components and Assemblies to be incorporated in manufacturing new Vehicle models with respect to new Vehicles manufactured or sold in the U.S.”</p>	<p>Request 1(g)(8): “Responses to the RFQ from potential suppliers, including but not limited to . . . <i>proposed changes in the design, manufacturing, materials, or specifications</i> of the Component or Assembly.</p> <p>Partial overlap; see Request 1(g)(10): “Potential suppliers, if any, that <i>provided on-site engineers or other personnel or services</i> in connection with the Component or Assembly”</p>
<p>Request 36: “Documents sufficient to show the existence of lists or compilations of OEM-approved parts suppliers, to the extent they include suppliers of Components or Assemblies for installation in new Vehicles sold or leased in the U.S., the criteria for the inclusion of a supplier on such lists or compilations, the process by which OEMs approve suppliers to be added to such lists or compilations, and the lists or compilations themselves.”</p>	<p>Partial overlap; see Request 3: “Documents sufficient to show Your agreements with suppliers of Components or Assemblies, including but not limited to any documents relating to and/or constituting <i>Long Term Agreements, Master Purchase Agreements, Component Purchase Agreements, any preferred supplier or supplier partner agreements and Memoranda of Understanding</i> applicable to any purchase of Components or Assemblies by You or on Your behalf for installation in a new Vehicle sold or leased in the U.S.</p>